

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

TALECRIS BIOTHERAPEUTICS, INC.
and BAYER HEALTHCARE LLC,

Plaintiffs,

v.

BAXTER INTERNATIONAL INC., and
BAXTER HEALTHCARE CORPORATION,

Defendants.

BAXTER HEALTHCARE CORPORATION

Counterclaimant,

v.

TALECRIS BIOTHERAPEUTICS, INC., and
BAYER HEALTHCARE LLC.,

Counterdefendants.

C.A. No. 05-349-GMS

Demand for Jury Trial

JOINT CLAIMS CONSTRUCTION STATEMENT

Pursuant to the Scheduling Order entered in this matter, the parties jointly submit the attached Joint Claim Construction Chart (Exhibit A) which provides the parties' respective construction of disputed claim language with citations to the intrinsic evidence in support of their respective proposed constructions.

Should the Court have any questions regarding the Chart, the parties will make themselves available at a time convenient for the Court.

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DATED: October 13, 2006

CERTIFICATE OF SERVICE

I hereby certify that on October 13, 2006, I electronically filed the foregoing document with the Clerk of Court using CM/ECF which will send notification of such filing to the following, and that the document is available for viewing and downloading from CM/ECF:

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I hereby certify that on October 13, 2006, I caused to be served true and correct copies of the foregoing document on the following in the manner indicated below:

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